

**United States Bankruptcy Court
District of New Jersey**

In re **Kenneth J. Zerambo**
Debtor*

Case No. **23-11426-pmm**
Chapter **13**

**CERTIFICATION IN OPPOSITION TO CARRINGTON MORTGAGE SERVICES, LLC'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY (DOCKET NO. 29)**

I, Erik M. Helbing, having been first sworn according to law depose and say the following:

1. I am an adult individual over the age of 18 and am the Attorney for the Debtor in the above-captioned matter.
2. The information contained within the Certification is within my personal knowledge and as such I am competent to provide it.
3. The above-captioned case was filed on May 16, 2023, with the filing of a Voluntary Petition pursuant to Chapter 13 of the United States Bankruptcy Code.
4. On May 16, 2023, the Debtor filed a Chapter 13 Plan.
5. The Order Confirming Chapter 13 Plan was entered on October 19, 2023.
6. On May 2, 2024, Kenneth E. West, Chapter 13 Trustee, filed a Motion to Dismiss Case for Failure to Make Plan Payment.
7. Pursuant to the Motion to Dismiss, the Debtor(s) has/have failed to commence or continue making timely payments to the trustee as required by 11 U.S.C. Section 1326..
8. A Motion to Modify the Confirmed Plan will be filed prior to the Motion to Dismiss hearing scheduled for 6/6/2024.
9. I understand that any intentionally false statements in this document are subject to punishment.

Respectfully Submitted:

/s/Erik M. Helbing
Erik M. Helbing, Attorney for Debtor